

BANDAG, INCORPORATED * 2905 N. HWY. 61 * MUSCATINE, IA 52761-5886 *319/262-1400
Leading the retread industry worldwide

January 30, 2001

VIA E-MAIL AND FIRST CLASS MAIL

Docket Management Section
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room PL-401
Washington, DC 20590

**RE: Docket No. NHTSA-00-8296 – Request for Comments
- Certification; Federal Motor Vehicle Safety Standards;
Tire Identification and Recordkeeping; Consumer Information Regulations
[Federal Register, Vol. 65, No. 232, December 1, 2000, 75222]**

Bandag, Incorporated's traditional business is engaged primarily in the production and sale of precured tread rubber and equipment used by its franchisees for the retreading of tires for trucks, buses, light commercial trucks, industrial equipment, and off-the-road equipment. Bandag specializes in a patented cold-bonding retreading process which it introduced to the United States in 1957 (the "Bandag Method"). Bandag, Incorporated franchises the rights to utilize the Bandag Method to independent tire dealers. The Bandag Method separates the process of vulcanizing the tread rubber from the process of bonding the tread rubber to the tire casing, allowing for optimization of temperature and pressure levels at each stage of the retreading process.

Bandag, Incorporated appreciates the opportunity extended to us to submit comments in response to the above referenced Docket Number. Listed below is the response of Bandag, Incorporated to the Request for Comment question twenty-four (24) within that Docket, which is as follows:

- (24) What changes, if any, should be made in the labeling requirements applicable to retreaded tires? Please provide the basis for your response.

RESPONSE: The majority of retreaded tires produced today by Bandag, Incorporated franchisees are utilized in commercial tire applications. Consequently, the work associated with the labeling of retreaded tires is currently being performed by skilled technicians and personnel who have the training and experience to correctly utilize the current labeling requirements. As such, Bandag, Incorporated believes that the current requirements for commercial tire labeling are sufficient and do not need to be changed.

Thank you for the opportunity for Bandag, Incorporated to express its opinion on this issue. Please do not hesitate to contact our organization if Bandag, Incorporated can be of further assistance to NHTSA.

Sincerely,

Harrell Huneycutt
Marketing Manager,
Market Research, Information & Planning
Bandag, Inc.
Muscatine, IA
(319-262-1172)